



*Consulting Engineers  
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December 7, 2012  
(PBW Project No. 1651)

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Mr. Chris Villarreal  
Remedial Project Manager, 6SF-RA  
U.S. Environmental Protection Agency Region 6  
1445 Ross Avenue  
Dallas, Texas 75202

Re: Bi-Monthly Progress Report, R&H Oil/Tropicana Energy Site, San Antonio, Texas

Dear Mr. Villarreal:

Pursuant to Section IX, Paragraph 37 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period – The following actions were taken during the previous two-month period:
  - Soil-gas sample point SG-22 was repaired on Monday, October 16.
  - A Work Plan Refinement/Modification Notice (October 17, 2012) was prepared to address the collection of additional soil samples along the ditch in the northwest corner of the Site in accordance with EPA's request for additional data for the Screening Level Risk Assessment (SLERA).
  - In response to EPA's request, a revised RI/FS Figure 12 *Projected Schedule* was provided to EPA on October 18, 2012.
  - A vapor sampling event was conducted at the Site on October 24, 2012 which included collection of split samples by the US EPA oversight contractor (EA Engineering). Vapor samples were collected from sample points SG-21, SG-22 and SS-2.
  - Three additional surface soil samples were collected along the fence-line in the northeast corner of the Site to provide additional data for completion of the (SLERA) as part of the October 24, 2012 sampling activities.
  - A groundwater gauging and LNAPL thickness measurement event was conducted at the Site on October 24, 2012. LNAPL was bailed from wells

containing >0.5 ft of LNAPL in-well thickness. The results of the gauging event are provided in the attached data tables.

- A groundwater gauging and LNAPL thickness measurement event was conducted at the Site on November 27, 2012. LNAPL was bailed from wells containing >0.5 ft of LNAPL. The results of the gauging event are provided in the attached data tables.
  - Laboratory analysis of soil and vapor samples was performed. Validation of laboratory data was partially performed and is ongoing.
  - Revision of the draft SLERA was initiated based on EPA comments.
  - Partial preparation of the RI Report, Baseline Human Health Risk Assessment and Feasibility Study was completed.
2. Quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – No quality-assured data were received during the preceding two-month period.
3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion – The following work is planned for the next two months:
- Completion of the data validation for the samples collected during the October 24, 2012 sampling activities.
  - Groundwater gauging and LNAPL recovery activities will continue through January 2013.
  - Submittal of the revised draft SLERA is expected in the next two-month period.
  - Preparation of the RI Report, Baseline Human Health Risk Assessment and Feasibility Study are ongoing.

The planned schedule for this work is generally consistent with the overall RI/FS schedule provided in the approved RI/FS Work Plan.

4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered or anticipated during the preceding two-month period.

Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

  
For

Eric F. Pastor P.E.  
Principal Engineer



Tim Nickels  
Project Scientist

Attachments:

Table 1 Monitoring Well Gauging Summary – October 24, 2012  
Table 2 Monitoring Well Gauging Summary – November 27, 2012

cc: Marilyn Long – TCEQ  
Leslie Alexander – de maximis, inc.  
Brad Bredesen – Structural Metals, Inc.  
Lee Bishop – Exxon Mobil Corporation  
Heather Corken – Fulbright & Jaworski, LLP  
Gary Elkin – BAE Systems Resolution, Inc.  
Jack Healy – Perkin Elmer Automotive Research, Inc.  
Heidi Hughes Bumpers – Jones Day  
Larry King – Flint Group Incorporated  
Paul Kirkpatrick – Structural Metals, Inc.  
Earl Moran – Exxon Mobil Corporation  
James Morriss, III – Thompson & Knight, LLP  
Duane Ness – Flint Group Incorporated  
Eva O'Brien - Fulbright & Jaworski, LLP  
Mary Smith - Office of the Attorney General of Texas  
Robert Sterrett – Itasca Denver, Inc.  
Rudy Valdes – National Radiator  
Elizabeth Webb – Thompson & Knight, LLP

**TABLE 1**  
**MONITORING WELL GAUGING SUMMARY - October 24, 2012**  
R&H Oil Company/Tropicana Energy Site, San Antonio, Texas

Well ID	Date	Screen Interval (ft, BGS)	Measuring Point Elevation (ft, MSL)	Depth to Water (ft, BMP)	Depth to NAPL (ft, BMP)	NAPL Thickness (ft)	Water Level Elevation (ft, MSL)	Corrected Water Level Elevation (ft, MSL)
MW-1	10/24/2012	10-40	657.29	19.22	ND	--	638.07	638.07
MW-2	10/24/2012	11-42	659.25	21.36	ND	--	637.89	637.89
MW-3	10/24/2012	10-48	657.34	20.07	19.26	0.81	637.27	637.90
MW-4	10/24/2012	10-44	660.21	22.01	ND	--	638.20	638.20
MW-5	10/24/2012	10.5-43	656.93	19.03	18.94	0.09	637.90	637.97
MW-6	10/24/2012	10-54.5	656.95	19.40	18.92	0.48	637.55	637.92
MW-7	10/24/2012	30-45	655.13	17.36	ND	--	637.77	637.77
MW-8	10/24/2012	30-45	654.42	17.81	ND	--	636.61	636.61
MW-9	10/24/2012	25-40	654.17	16.50	ND	--	637.67	637.67
MW-10	10/24/2012	23-38	653.57	16.03	ND	--	637.54	637.54
MW-11	10/24/2012	25-40	654.55	16.44	ND	--	638.11	638.11
MW-12	10/24/2012	10-25	659.90	21.50	21.36	0.14	638.40	638.51
MW-13	10/24/2012	10-25	662.65	25.85	24.36	1.49	636.80	637.96
MW-14	10/24/2012	10-25	660.17	22.40	21.91	0.49	637.77	638.15
MW-15	10/24/2012	10-25	659.94	22.08	21.49	0.59	637.86	638.32
MW-16	10/24/2012	10-25	659.20	21.36	ND	--	637.84	637.84
MW-17	10/24/2012	10-25	659.23	21.42	ND	--	637.81	637.81
MW-18	10/24/2012	10-25	660.60	22.33	ND	--	638.27	638.27
MW-19	10/24/2012	10-25	658.37	20.79	20.38	0.41	637.58	637.90
MW-20	10/24/2012	10-30	659.38	21.35	ND	--	638.03	638.03
MW-21	10/24/2012	8-23	654.19	16.54	ND	--	637.65	637.65
MW-22	10/24/2012	10-25	654.07	16.70	ND	--	637.37	637.37
NMW-1	10/24/2012	10-25	662.30	24.29	24.12	0.17	638.01	638.14
NMW-2	10/24/2012	10-25	660.61	22.61	ND	--	638.00	638.00
NMW-3	10/24/2012	10-25	660.63	22.62	22.38	0.24	638.01	638.20
NMW-4	10/24/2012	10-25	660.99	22.86	22.84	0.02	638.13	638.15
NMW-5	10/24/2012	10-25	660.45	22.28	ND	--	638.17	638.17

Notes:

1. Water levels in wells containing LNAPL were corrected using an LNAPL specific gravity of 0.78 as determined from analysis of LNAPL collected at well NMW-3.
2. LNAPL was bailed from monitoring wells containing >0.5-feet of LNAPL.
3. ND - Measurable LNAPL thickness not greater than 0.01 feet. MSL = Mean sea level.
4. BMP = Below measuring point. BGS = Below ground surface.

**TABLE 2**  
**MONITORING WELL GAUGING SUMMARY - November 27, 2012**  
R&H Oil Company/Tropicana Energy Site, San Antonio, Texas

Well ID	Date	Screen Interval (ft, BGS)	Measuring Point Elevation (ft, MSL)	Depth to Water (ft, BMP)	Depth to NAPL (ft, BMP)	NAPL Thickness (ft)	Water Level Elevation (ft, MSL)	Corrected Water Level Elevation (ft, MSL)
MW-1	11/27/2012	10-40	657.29	19.31	ND	--	637.98	637.98
MW-2	11/27/2012	11-42	659.25	21.39	ND	--	637.86	637.86
MW-3	11/27/2012	10-48	657.34	20.02	19.33	0.69	637.32	637.86
MW-4	11/27/2012	10-44	660.21	22.08	ND	--	638.13	638.13
MW-5	11/27/2012	10.5-43	656.93	19.17	18.97	0.2	637.76	637.92
MW-6	11/27/2012	10-54.5	656.95	19.67	19.01	0.66	637.28	637.79
MW-7	11/27/2012	30-45	655.13	17.32	ND	--	637.81	637.81
MW-8	11/27/2012	30-45	654.42	17.10	ND	--	637.32	637.32
MW-9	11/27/2012	25-40	654.17	16.52	ND	--	637.65	637.65
MW-10	11/27/2012	23-38	653.57	16.08	ND	--	637.49	637.49
MW-11	11/27/2012	25-40	654.55	16.18	ND	--	638.37	638.37
MW-12	11/27/2012	10-25	659.90	21.35	ND	--	638.55	638.55
MW-13	11/27/2012	10-25	662.65	25.10	24.36	0.74	637.55	638.13
MW-14	11/27/2012	10-25	660.17	22.54	22	0.54	637.63	638.05
MW-15	11/27/2012	10-25	659.94	22.45	21.89	0.56	637.49	637.93
MW-16	11/27/2012	10-25	659.20	21.40	ND	--	637.80	637.80
MW-17	11/27/2012	10-25	659.23	21.45	ND	--	637.78	637.78
MW-18	11/27/2012	10-25	660.60	22.55	ND	--	638.05	638.05
MW-19	11/27/2012	10-25	658.37	21.04	20.44	0.6	637.33	637.80
MW-20	11/27/2012	10-30	659.38	21.41	ND	--	637.97	637.97
MW-21	11/27/2012	8-23	654.19	16.56	ND	--	637.63	637.63
MW-22	11/27/2012	10-25	654.07	16.69	ND	--	637.38	637.38
NMW-1	11/27/2012	10-25	662.30	24.10	23.9	0.2	638.20	638.36
NMW-2	11/27/2012	10-25	660.61	22.66	ND	--	637.95	637.95
NMW-3	11/27/2012	10-25	660.63	23.84	22.19	1.65	636.79	638.08
NMW-4	11/27/2012	10-25	660.99	22.92	22.9	0.02	638.07	638.09
NMW-5	11/27/2012	10-25	660.45	22.41	ND	--	638.04	638.04

Notes:

1. Water levels in wells containing LNAPL were corrected using an LNAPL specific gravity of 0.78 as determined from analysis of LNAPL collected at well NMW-3.
2. LNAPL was bailed from monitoring wells containing >0.5-feet of LNAPL.
3. ND - Measurable LNAPL thickness not greater than 0.01 feet. MSL = Mean sea level.
4. BMP = Below measuring point. BGS = Below ground surface.